

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Roanoke Division**

In Re: Angela Dawn Potes

Case No. 13-70812
Chapter 13

OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, JPMorgan Chase Bank, N.A., which holds a Deed of Trust secured by the Debtor's real property at 1149 Pernello Road, Ferrum, Virginia 24088, by and through its attorney, Abby K. Moynihan, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$4,000.00 for arrearages owed to JPMorgan Chase Bank, N.A..
2. The secured creditor, JPMorgan Chase Bank, N.A., anticipates filing a Proof of Claim with arrearages in the approximate amount of \$29,403.73.
3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of JPMorgan Chase Bank, N.A..

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/Abby K. Moynihan, Esq.

Attorney for JPMorgan Chase Bank, N.A.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on July 31, 2013, to Angela Dawn Potes at 1149 Pernello Rd., Ferrum, Virginia 24088. Copies were sent electronically via the CM/ECF system to Phillip Edward Brown, Attorney for Debtor and Christopher T. Micale, Trustee.

/s/ Abby K. Moynihan, Esq.